



UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

MELAHAT RAFIEI,

Defendant.

No. 8:23-cr-00006-FWS

I N F O R M A T I O N

[18 U.S.C. §§ 1343, 1349:
Attempted Wire Fraud]

The United States Attorney charges:

[18 U.S.C. §§ 1343, 1349]

A. THE SCHEME TO DEFRAUD

1. Beginning no later than September 2019, and continuing through at least October 2019, in Orange County, within the Central District of California, defendant MELAHAT RAFIEI, knowingly and with intent to defraud, devised and attempted to execute a scheme to defraud and obtain money from Victim 1 by means of materially false and fraudulent pretenses, representations, and promises, and material omissions of facts, by transmitting and causing the transmission of funds into bank accounts controlled by defendant RAFIEI, by means of

1 wire communications in interstate commerce, for the purpose of
2 executing such scheme.

3 2. The scheme to defraud operated, in substance, as follows:

4 a. Defendant RAFIEI falsely represented to Victim 1 that,
5 in exchange for a payment of at least \$300,000, she would work to
6 pass a cannabis-related ordinance in Anaheim that would exclusively
7 benefit and be tailored for Victim 1's business, when in fact,
8 defendant RAFIEI was already working on the same ordinance on behalf
9 of other paying clients.

10 b. Defendant RAFIEI falsely represented to Victim 1 that
11 defendant RAFIEI would keep only \$10,000 of Victim 1's payment in
12 exchange for her purported work, when in fact, defendant RAFIEI
13 intended to keep \$100,000 of Victim 1's payment.

14 c. Defendant RAFIEI falsely represented to Victim 1 that
15 \$200,000 of Victim 1's payment would go to the Anaheim Chamber of
16 Commerce, when in fact, defendant RAFIEI intended to split \$200,000
17 of the \$300,000 equally between her and an associate of hers who was
18 not affiliated with the Anaheim Chamber of Commerce.

19 B. THE ATTEMPTED USE OF INTERSTATE WIRES

20 3. Beginning no later than September 2019, and continuing
21 through at least October 2019, for the purpose of executing the
22 scheme to defraud, defendant RAFIEI attempted to cause the
23 transmission of items by means of wire communications in interstate
24 commerce. Specifically, defendant RAFIEI would instruct Victim 1 to

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1 pay the \$300,000 via checks that would be deposited into financial
2 accounts controlled by defendant RAFIEI, thereby causing the
3 transmission of wire communications in interstate commerce.
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6 JOSEPH T. MCNALLY
7 United States Attorney,
8 Acting Under Authority Conferred
9 by 28 U.S.C. § 515.

A handwritten signature in blue ink, appearing to read "Mack E. Jenkins", is written over the typed name and title.

10 MACK E. JENKINS
11 Assistant United States Attorney
12 Chief, Criminal Division

13 BENJAMIN R. BARRON
14 Assistant United States Attorney
15 Chief, Santa Ana Branch Office

16 DANIEL S. LIM
17 MELISSA S. RABBANI
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